



# **Safety Directives: Providing a Systems- Based Approach to Directives Management**

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**Office of Health, Safety and Security (HSS)**  
**August 27, 2008**



# Purpose & Benefits

- **Implement Secretary's Principles Governing Directives (9/10/07)**
- **Understand & address stakeholder concerns**
- **Document technical basis for each requirement**

# Secretary's Principles

## Desired Attributes of Directives:

- **What vs. How** (Clear requirements; Not *overly* prescriptive; “How” requirements for safety)
- **Requirements Not Duplicative** (no duplication of laws, regulations, or national standards)
- **Clear Applicability**
- **Resolve Conflicting Requirements**

# Project Scope

- **Project Plan approved January 2008**
- **Safety Orders and Manuals (26) for which HSS is the OPI or “owner”**
- **All of interest to the DNFSB**
- **NOT Rules, Policies, Guides, Tech Standards, or Handbooks**

# Process – Key Attributes

- Review Teams – 8-10 members typically
- Red Teams – 4-6 members
- Use of Requirements Database
- Establish basis for all requirements
- Use DOE decision-makers on policy
- Use approved P/O/M 251 process
- Identify changes for guides/standards

# Systems-Based Approach

- **Phased approach based on grouping directives into topic areas**
- **Nuclear Safety Operations (Phase 1)**
- **Management Systems (Phase 2)**
- **Worker Safety (Phase 3)**
- **Feedback and Improvement (Phase 3)**

# Phase 1A Directives

- **O 425.1C, Startup and Restart of Nuclear Facilities**
- **M 426.1-1A, Federal Technical Capability Manual**
- **O 5400.5, Radiation Protection of the Public and the Environment**

# Phase 1B Directives

- **O 433.1A, Maintenance Management Program for DOE Nuclear Facilities**
- **O 5480.19, Conduct of Operations Requirements for DOE Facilities**
- **O 5480.20A, Personnel Selection, Qualification, Training and Staffing Requirements for DOE Reactor and Non-Reactor Nuclear Facilities**



# Phase 2 Directives

- **M 140.1-1B, Interface with the Defense Nuclear Facilities Safety Board**
- **O 226.1A, Implementation of Department of Energy Oversight Policy**
- **M 411.1-1C, Safety Management Functions, Responsibilities, and Authorities Manual**
- **O 414.1C, Quality Assurance**
- **M 450.3-1, DOE Closure Process for Necessary and Sufficient Sets of Standards**
- **M 450.4-1, Integrated Safety Management System Manual**

# Phase 3 Directives

- **O 210.2, DOE Corporate Operating Experience Program**
- **O 225.1A, Accident Investigations**
- **O 231.1A, Environment, Safety, and Health Reporting**
- **M 231.1-1A, Environment, Safety and Health Reporting Manual**
- **M 231.1-2, Occurrence Reporting & Processing of Operations Information**
- **O 252.1, Technical Standards Program**

# Phase 3 Directives

- **O 420.1B, Facility Safety**
- **O 440.1B, Worker Protection Management for DOE Federal Employees**
- **M 440.1-1A, DOE Explosives Safety Manual**
- **M 442.1-1, Differing Professional Opinions Manual for Technical Issues Involving Environment, Safety, or Health**
- **O 5480.30, Nuclear Reactor Safety Design Criteria**

# Leadership Team

**Stephen A. Kirchhoff (HSS)**

**George J. Malosh (SC)**

**James J. Cavanagh (NNSA)**

**Richard F. Moorer (US)**

**Kevin T. Hagerty (MA)**

# Leadership Team Role

- **Provide overall direction & guidance**
- **Approve team members**
- **Approve release for DOE-wide review**
- **Approve review comments from their organization**
- **Identify lessons learned to improve directives process & implementation**

# Project Schedule

- **Phased approach**
- **Started Phase 1A in January 2008 and Phase 1B in February**
- **Start Phase 2 in June 2008**
- **Start Phase 3 in November 2008**
- **Complete draft revisions in 4-6 months, followed by final review & issuance per DOE directives process**

# Contact Information

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